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*Proposed Counsel to the Official Committee  
 of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF TEXAS  
 DALLAS DIVISION**

In re:	§	Chapter 11
ERG Intermediate Holdings, LLC, <i>et al.</i> , <sup>1</sup>	§	Jointly Administered
Debtors.	§	Case No. 15-31858-hdh-11

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**NOTICE OF DEPOSITION**

TO: ERG Intermediate Holdings, LLC and the above-captioned debtors (collectively, the "Debtors") c/o Jones Day, Attention Tom A. Howley, 717 Texas Avenue, Suite 3300, Houston, Texas 77002; Jones Day, Attention Brad B. Erens, Joseph A. Florczak, 77 West Wacker, Chicago, Illinois 60601.

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26 and 30, made applicable by Federal Rules of Bankruptcy Procedure 7026, 7030 and 9014, the Official

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309.

Committee of Unsecured Creditors (the “Committee”), through its attorneys, will take the depositions upon oral examination of the witnesses identified below relating to (a) *Motion of the Debtors for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief* (Docket No. 20); (b) *Motion for Entry of Interim and Final Orders Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code and Rule 4001 of the Federal Rules of Bankruptcy Procedure* (A) *Authorizing the Debtors to (I) Use Cash Collateral of the Pre-Petition Financing and (II) Provide Adequate Protection to the Pre-Petition Secured Parties*, (B) *Prescribing Form and Manner of Notice and Scheduling Final Hearing and (c) Granting Related Relief* (Docket No. 15), and (c) *Motion of the Official Committee of Unsecured Creditors to Transfer Venue* (Docket No. 94). The depositions will take place before a court reporter and will be recorded by stenographic means, may be videotaped, and shall continue from day to day until they have been completed:

Kelly Plato 10:00 a.m.

Becky Roof 2:00 p.m.

The depositions shall take place on Tuesday, May 26, 2015, at the offices of Jones Day, 717 Texas Avenue, Suite 3300, Houston, Texas, or at such other time, date and location as the parties may agree.

Dated: May 18, 2015

*/s/ Jason R. Searcy*

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**THE UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF TEXAS  
 DALLAS DIVISION**

In re: § Chapter 11

ERG Intermediate Holdings, LLC, et al.,<sup>1</sup> § Jointly Administered

Debtors. § Case No. 15-31858-hdh-11

§

§

**AFFIDAVIT OF SERVICE**

Sophia L. Lee, being duly sworn according to law, deposes and says that she is employed by the law firm of Pachulski Stang Ziehl & Jones LLP, and that on the 18<sup>th</sup> day of May, 2015, she caused a copy of the following document to be served upon the attached service list in the manner indicated:

**Notice of Deposition**



Sophia L. Lee

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

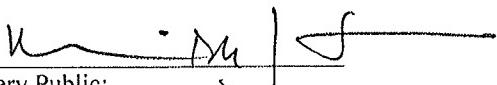
**CA JURAT W/AFFIANT STATEMENT:**

**GOV'T CODE § 8202**

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California      )  
County of Los Angeles    )

Subscribed and sworn to (or affirmed) before me on  
this 18th day of May, 2015 by Sophia L. Lee and  
proved to me on the basis of satisfactory evidence  
to be the person who appeared before me.

  
Notary Public:  
My Commission Expires: 11/27/17



SERVICE LIST

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Case No. 15-31858-hdh-11

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In re: ERG Intermediate Holdings, L.L.C., et al. - Service List Dated May 18, 2015

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In re: ERG Intermediate Holdings, L.L.C., et al. - Service List Dated May 18, 2015

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